

WARNING LETTER

OVERNIGHT EXPRESS DELIVERY

April 2, 2019

Anthony Marone
Senior Vice President, Gas Operations
AVANGRID Networks
Total Peaking Services
180 Marsh Hill Rd.
Orange, CT 06477

CPF 1-2019-5004W

Dear Mr. Marone:

On April 24 to April 30, 2018, an inspector from the Connecticut Department of Energy and Environmental Protection (CT DEEP), acting as Agent for Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of Title 49 of the United States Code inspected Total Peaking Services' (TPS) records and procedures at its LNG plant located in Bridgeport, Connecticut.

As a result of the inspection, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

1. § 193.2619 Control Systems

...

(c) Control systems in service, but not normally in operation, such as relief valves and automatic shutdown devices, and control systems for internal shutoff valves for bottom penetration tanks must be inspected and tested once each calendar year, not exceeding 15 months, with the following exceptions:

...

(2) Control systems that are intended for fire protection must be inspected and tested at regular intervals not to exceed 6 months.

TPS failed to inspect and test at regular intervals not to exceed 6 months, control systems that are intended for fire protection. Specifically, TPS failed to inspect and test UV detection at intervals not to exceed 6 months.

During the inspection, the CT DEEP inspector reviewed TPS's Preventive Maintenance Work Orders from April 2016 to September 2017. Records provided showed UV detection inspections and tests were performed on 7/14/2016 and 9/18/2017. The interval between inspections and tests exceeded 6 months.

Therefore, TPS failed to inspect and test a control system that is intended for fire protection, UV detection, at regular intervals not to exceed 6 months.

2. § 193.2717 Training, fire protection.

...

(b) A written plan of continuing instruction, including plant fire drills, must be conducted at intervals of not more than 2 years to keep personnel current on the knowledge and skills they gained in the instruction under paragraph (a) of this section.

TPS failed to conduct plant fire drills at intervals of not more than 2 years to keep personnel current on the knowledge and skills they gained in the instruction under § 193.2717(a).

During the inspection, the CT DEEP inspector reviewed records of TPS's plant fire drills. The records demonstrated that TPS performed plant fire drills on November 12, 2014 and November 29, 2016. This exceeds the maximum interval of 2 years by 17 days. Upon being informed of this issue, TPS stated they will change the recurrence on this work order to 21 months to provide adequate time to complete future plant fire drills within the required interval.

Please be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

No reply to this letter is required. If you choose to reply, please submit all correspondence in this matter to Robert Burrough, Director, PHMSA Eastern Region, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. Please refer to **CPF 1-2019-5004W** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on a USB flash drive accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

Robert Burrough

Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration